

EXHIBIT A

Derek C. Chen

From: Laurie_Cuaresma@wawd.uscourts.gov
Sent: Wednesday, August 30, 2017 10:59 AM
To: LaHoma Walker
Cc: Derek C. Chen; Jayne L. Freeman; JULIE; Lowell_Williams@wawd.uscourts.gov
Subject: RE: case No. 2:17-cv-00642 RSM

Counsel and Ms. Dalessio,

In reviewing the documents at issue, the Court had identified several pages that still contained Ms. Dalessio's social security number, as well as her date of birth, which is why they were sealed and why the Court sent the electronic message to Defendant to make further redactions. Once those additional redactions have been made, please re-file a new redacted copy publicly.

Ms. Dalessio, if you believe that the newly redacted documents still contain information that should be further redacted or filed under seal, you may submit a motion to the Court, specifically identifying where the objectionable information is contained, by docket, exhibit and page numbers, and the legal basis for your motion, and the Court will address the matter accordingly. Any such motion to seal must be noted in compliance with the Court's Local Rules. The Court will no longer entertain informal email requests from you with regard to this matter. The Court also notes that Local Civil Rule 5.2, which is accessible on the Court's website, governs the information that must be redacted when filed with the Court.

Regards,



Laurie Cuaresma
Courtroom Deputy to
Chief Judge Ricardo S. Martinez
United States District Court
Western District of Washington
206-370-8521

From: LaHoma Walker <LWalker@kbmlawyers.com>
To: "laurie_cuaresma@wawd.uscourts.gov" <laurie_cuaresma@wawd.uscourts.gov>
Cc: "Derek C. Chen" <DChen@kbmlawyers.com>, "Jayne L. Freeman" <JFreeman@kbmlawyers.com>, "Lowell_Williams@wawd.uscourts.gov" <Lowell_Williams@wawd.uscourts.gov>, JULIE <juliedalessio@msn.com>
Date: 08/29/2017 01:13 PM
Subject: RE: case No. 2:17-cv-00642 RSM

Ms. Cuaresma,

Since receiving the Court's email yesterday, Defendant has been working with Ms. Dalessio to ensure all dates of birth have been redacted to the year as required by WDLCR 5.2(a). Plaintiff has not identified any additional pages that contain her DOB other than the three that Defendant has found. We are unaware of any rule that permits us to further redact dkts. 30-1 or 30-2. Ms. Dalessio clearly still believes there is information that

should be redacted, but we do not see a mechanism that would allow us to do so, and she does not identify specifically what she would like redacted. The document is necessary in order for the Court to rule on the merits of the case and will be needed at the appellate level if that ever becomes necessary.

Because Ms. Dalessio decided to email the Court prior to the parties concluding their discussions, Defendant feels the need to respond. We have no problem with dkts. 30-1 and 30-2 (or the newly redacted versions) remaining sealed, as we see no need for this information to be public. However, we do not believe the parties can stipulate to this under the court rules. Ms. Dalessio refuses to identify any additional dates of birth she believes Defendant missed, and therefore we have a copy ready to submit with our best attempt at catching all required redactions.

Please let us know if you would like us to: 1) file the newly redacted documents under seal under the Court can make a determination regarding whether they deserve to be under seal, or 2) file the documents with the additional redactions.

Thank you for your time.

Sincerely,

LaHoma Walker
Legal Assistant to
Derek C. Chen
Jayne L. Freeman
Kimberly J. Waldbaum
Michael C. Walter
Keating Bucklin & McCormack, Inc., P.S.
801 2nd Avenue, Suite 1210
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KEATING, BUCKLIN & McCORMACK

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From: JULIE [<mailto:juliedalessio@msn.com>]
Sent: Tuesday, August 29, 2017 12:50 PM
To: laurie_cuaresma@wawd.uscourts.gov
Cc: Derek C. Chen <DChen@kbmlawyers.com>; Jayne L. Freeman <JFreeman@kbmlawyers.com>; LaHoma Walker <LWalker@kbmlawyers.com>; Lowell_Williams@wawd.uscourts.gov
Subject: Re: case No. 2:17-cv-00642 RSM

Dkt. # 30-1 also contains information that should have been redacted, including my date of birth.

julie

From: Laurie_Cuaresma@wawd.uscourts.gov <Laurie_Cuaresma@wawd.uscourts.gov>
Sent: Monday, August 28, 2017 10:10:46 AM
To: JULIE
Cc: Derek C. Chen; ifreeman@kbmlawyers.com; LaHoma Walker; Lowell_Williams@wawd.uscourts.gov
Subject: Re: case No. 2:17-cv-00642 RSM

Ms. Dalessio,

Thank you for your e-mail. We have reviewed the exhibits and they comport with the e-filing requirements for the most part, but we have discovered that one exhibit contains information that should have been redacted. It will be sealed immediately, and Defendant will be directed to re-file the exhibit with the appropriate redactions.

Regards,



Laurie Cuaresma
Courtroom Deputy to
Chief Judge Ricardo S. Martinez
United States District Court
Western District of Washington
206-370-8521

From: JULIE <juliedalessio@msn.com>
To: "Laurie_Cuaresma@wawd.uscourts.gov" <Laurie_Cuaresma@wawd.uscourts.gov>
Cc: "ifreeman@kbmlawyers.com" <ifreeman@kbmlawyers.com>, "Derek C. Chen" <DChen@kbmlawyers.com>, LaHoma Walker <LWalker@kbmlawyers.com>
Date: 08/27/2017 11:52 AM
Subject: case No. 2:17-cv-00642 RSM

Regarding Dalessio v. University of Washington

The University has moved for dismissal of my claims, to be heard sept 15.

in their filings with the court, they have included the complete set of documents that I have claimed were inappropriately provided to my neighbor, thus **publicly re-disseminating** personal, confidential, and statutorily exempt information including my **date of birth**, personal uw student/alumni email, health information etc, as described in my complaint at page 7.

please let me know how this can be remedied

thank-you
julie dalessio
206 324 2590